

## EXHIBIT 35

IN THE CIRCUIT COURT OF THE STATE OF OREGON  
FOR THE COUNTY OF JACKSON

In the Matter of:

HEIDI MARIE BROWN,

Petitioner,

and

ARNAUD PARIS,

Respondent, Pro Per.

Case No. 23CN05721

**MOTION FOR CONTINUANCE FOR  
ALLOWING RESPONDENT TO FIND  
NEW COUNSEL SPECIALIZED IN  
INTERNATIONAL FBI ARREST AND  
EXTRADITION ORDERS AND FOR  
PENDING RECONSIDERATION OF  
THE DISQUALIFICATION OF JUDGE  
ORR FOR LACK OF IMPARTIALITY -  
ORS 14.250**

I, Arnaud Paris, Respondent Pro Per in the above-captioned case, moves this court for an order allowing Father, respondent, to find a new counsel that would be specialized in international FBI arrest and extradition orders and for the pending reconsideration of the disqualification of Judge ORR for lack of impartiality in this matter per ORS 14.250 for the following reasons:

1. New developments in the Jackson County state court proceedings happened last week that are making it impossible for Father to come to the USA anymore and him being at risk of being extradited from France and with his children also being detained by the police and also facing extradition from France which would have dramatic consequences on the children emotional and psychological well-being, especially in the

1 middle of their school year in Paris.

2 2. Indeed, on Friday February 23<sup>rd</sup>, Mother's counsel filed in the Jackson  
3 County proceedings an Ex Parte International Arrest Order against Father asking for the  
4 participation of the FBI to obtain an extradition of both Father and the children from  
5 France. (See attached Exhibit 01). Mother's counsel followed Judge ORR's advice to file  
6 such an order during the hearing of December 28<sup>th</sup> 2023 and it seems both the court and  
7 Miss Brown's counsel are using the Jackson County proceedings in bad faith to harass  
8 Respondent to the point of trying to have him arrested in France and his children taken  
9 into custody with the participation of the FBI so that the three of them be extradited to the  
10 US which would deprive Respondent from his parental right in his own country, granted  
11 to him by the Paris court on April 21<sup>st</sup>, 2023 and that was confirmed by the Paris court  
12 again in a second judgment on August 25<sup>th</sup>, 2023, and this would also put the United  
13 States in violation of the Hague Convention of 1980 of which both France and the USA  
14 are signatory of.

15 3. Therefore, in this context Father has to urgently find a counsel specialized  
16 in these kind of international arrest and extradition orders involving the FBI and he  
17 respectfully asks the court to take into consideration the psychological well-being of the  
18 children that is threatened by this court's actions in this context and to allow Father to  
19 care for them and for their protection in France and in the USA as well as protecting their  
20 personal interest, that this court doesn't seem to have at heart, since they have no desire  
21 to be returned to the US in such a terrible context.

22 4. The children even shared with Father that they are now having nightmares  
23 of their Mother having them kidnapped and drugging them to force them to be returned

1 to the US and this all is seems related to their Mother having shared with the children two  
2 weeks ago that the police "would come and get them in France and arrest their Father".

3 5. In this terrible context of psychological violence imposed onto the children  
4 by Mother and this court as well as the unusual and exceptional circumstance of a court  
5 asking for an international arrest and extradition order with the help of the FBI in a family  
6 matter, it is of the utmost importance that the interest of both Father and the children be  
7 preserved by allowing Father 90 days to find a counsel specialized in this kind of  
8 international FBI arrest and extradition orders towards a parent and his children.

9 6. Given that the UCCJEA in the US is a body of law made specifically to  
10 address this kind of situation and that it is literally impossible for a Judge to go against a  
11 custodial determination form a country like France, this situation has simply never  
12 happened in the legal history of the United States. Therefore, finding a counsel that would  
13 have experience in this matter or something even remotely similar is extremely difficult  
14 and Father is asking the court for a continuance of at least 90 days to allow sufficient time  
15 to locate proper counsel that would also be available and willing to handle this kind of  
16 'unusual' matter to say the least, as it would also be involving the responsibility of the  
17 USA as a nation that this court is about to put in complete violation of the Hague  
18 Convention of 1980 that the US and France are a signatory of.

19 7. It is important to mention here that it is incredibly unusual that a state court  
20 involved in a family matter as it is the case here decides to bring this matter to an  
21 international criminal level that would require the involvement of the FBI issuing an  
22 international arrest and extradition order having the USA become improperly involved in  
23 another sovereign nation's affairs and to 'bully' this nation to obtain something that Mother

1 seems to believe she couldn't obtain through the legal course of her appeals currently  
2 undergoing in France.

3 8. It is all the more concerning to see the Jackson County court taking such  
4 an aggressive and improper course of action considering that there is a perfectly well-  
5 suited legal action that could be easily and rapidly activated in France through a Hague  
6 Action. It is actually the only logical remedy in the current situation, and it begs the  
7 question as to why the Jackson County court is being so aggressive and willing to 'bully'  
8 another nation into returning the children to the US? It is as if the Jackson County court  
9 considered that it is a better court to deal with the French appeals of Mother than the  
10 actual appeal court of France... Every single point and argument that Mother has made  
11 in the Jackson County court could and should be made in front of the appeal court of  
12 France. Why is it that Mother prefers to push for such an aggressive action through this  
13 court rather than using the proper return mechanism she could activate through a Hague  
14 Action in France or through her appeals to the French judgment in France? The only  
15 possible answer is that she wants to circumvent the French judicial system onto French  
16 soil itself by bullying France as a nation through the involvement of the USA and the FBI  
17 as a result of this abusive and bad faith court's orders made in the clear intent to harass  
18 Father and the children.

19  
20 Furthermore here are the other reasons why Respondent also feels it is  
21 important that this hearing be delayed considering the Motion for Reconsideration of  
22 Judge ORR's Disqualification per ORS 14.250 that was just filed on February 28<sup>th</sup> with  
23 the Jackson County court and that will require a hearing to be properly administrated by  
24

1 the Judge assigned to hear this Motion and for him to present his legal argument with  
2 Respondent being allowed to attend this hearing remotely to have a chance to respond  
3 and object to such legal arguments during the hearing. This will be necessary for the  
4 proper administration of justice in this matter considering the gross denial of due  
5 process that has been happening against Respondent in the Jackson County court over  
6 the last 18 months. Here is the basis for asking for reconsideration of the motion to  
7 disqualify:

8       On January 3<sup>rd</sup> 2024, I, Amaud Paris, Respondent, Pro Per, filed a motion for  
9 disqualification of Judge Orr based on substantiated evidence, including court  
10 transcripts, that Judge Orr was so biased against Respondent in open-court to the point  
11 of making improper jokes about French people and the French judicial system while  
12 Respondent is a French National and brought in front of this court a French custody  
13 judgment that the court rejected while refusing due process to Respondent.

14       Judge Orr has been assigned to this new contempt case 23CN05721 and in light  
15 of the evidence presented in the motion for disqualification filed on January 3<sup>rd</sup> with the  
16 Jackson County court, Respondent had clear ground to believe that he wouldn't be  
17 given a "fair and impartial trial or hearing" since Judge Orr had made improper jokes  
18 and comment about French people and the French judicial system in open court.

19       Judge Bloom considered the motion for disqualification without Respondent  
20 being informed of him being assigned to review it and Judge Bloom denied that motion  
21 without any justification for the reason nor any legal basis for this denial.

22       Respondent filed a motion on February 22<sup>nd</sup> to seek reconsideration of the  
23 decision from Judge Bloom to deny Respondent's previous motion for disqualification

1 under ORS 14.250, asserting that the decision lacked legal justification and failed to  
2 adhere to required procedural protections. The main grounds for reconsideration were:

- 3 • **Denial Lacks Statutory Basis:** ORS 14.250 does not provide explicit grounds  
4 for a judge to reject a motion for disqualification without a substantive legal basis.  
5 The absence of a detailed denial from Judge Bloom indicates a procedural  
6 oversight and a deviation from the principles of law.
- 7 • **Requirement for Legal Justification:** A mere denial without citing specific legal  
8 reasons is insufficient and undermines the procedural integrity of the court. The  
9 law mandates that decisions, especially denials of motions for disqualification, be  
10 grounded in clear legal rationale.
- 11 • **Insufficiency of Grounds for Denial:** The denial of the motion without  
12 addressing the cited reasons for disqualification suggests an insufficiency of  
13 grounds, making the denial procedurally defective.
- 14 • **Non-Compliance with Disqualification Law:** By not following the clear  
15 mandate of ORS 14.250 regarding disqualification, the court has not adhered to  
16 the statutory requirement, raising concerns about impartiality and fair trial rights.
- 17 • **Procedural Protection and Application of Law:** The court's refusal to engage  
18 with the motion's arguments or to apply the law as required constitutes a failure  
19 to provide the most basic procedural protections to the parties involved.

20 The decision made by Judge Bloom to deny the motion for disqualification without  
21 substantive justification not only contravened ORS 14.250 but also set a concerning  
22 precedent for the disregard of legal standards and procedural fairness. This is  
23 particularly troubling and concerning in light of the clear denial of due process and the



1 judicial bias against Respondent that took place already in Judge Orr's courtroom. The  
2 absence of a reasoned explanation by Judge Bloom or reference to applicable law in his  
3 denial of Respondent's motion for disqualification undermines the judiciary's  
4 responsibility to operate within the bounds of established legal frameworks.

5 In his motion for reconsideration, Respondent respectfully requested that the court:


- 6     • Reconsider and overturn the denial of the motion for disqualification of Judge Orr  
7     • Provide a detailed legal justification for any decision made regarding this motion,  
8         in compliance with ORS 14.250 and the principles of due process.

9 The integrity of the judicial process depends on adherence to the rule of law and  
10 procedural fairness. Therefore, Respondent request this court for a continuance of the  
11 show cause hearing set to happen on March 7<sup>th</sup> since the integrity and impartiality of  
12 Judge Orr is at question and Respondent feels he would be prejudiced by Judge Orr  
13 seating on this hearing for this crucial matter that could bear strong criminal  
14 consequences for Respondent as Judge Orr is not impartial in this matter.

15 Furthermore, now

16         I hereby declare that the above statement is true to the best of my knowledge  
17 and belief, and that I understand it is made for use as evidence in court and is subject to  
18 penalty for perjury of the laws in the state of Oregon.

19 Prepared on February 29th 2024 in Paris and sent to the court by FEDEX

20  
21 By:   
22 ARNAUD PARIS, Respondent, Pro Per  
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**CERTIFICATE OF SERVICE**

I hereby certify that I served the foregoing **MOTION FOR CONTINUANCE FOR ALLOWING RESPONDENT TO FIND NEW COUNSEL SPECIALIZED IN INTERNATIONAL FBI ARREST AND EXTRADITION ORDERS AND FOR PENDING RECONSIDERATION OF THE DISQUALIFICATION OF JUDGE ORR FOR LACK OF IMPARTIALITY - ORS 14.250** on the following party:

Heidi Marie Brown  
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Respondent

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Last Known Attorney for Respondent

By the following method or methods:


☐ by **mailing** full, true, and correct copies thereof in sealed, first class postage prepaid envelopes, addressed to the attorneys(s) as shown above, the last known office address of the attorney(s), and deposited with the United States Postal Service at Portland, Oregon on the date set forth below.

☒ by **emailing** full, true, and correct copies thereof to the attorney(s) at the email address shown above, which is the last known email address for the attorney(s) office, on the date set forth below.

☐ by **faxing** full, true, and correct copies thereof to the attorney(s) at the fax number(s) shown above, which is the last known fax number for the attorney(s) office, on the date set forth below. The receiving fax machines were operating at the time of service and the transmission was properly completed.

☐ by selecting the individual(s) listed above as a service contact when preparing this electronic filing submission, thus causing the individual(s) to be served by means of the **court's electronic filing system**.

Prepared on February 29th 2024 in Paris and sent to the court by FEDEX

By:   
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IN THE CIRCUIT COURT OF THE STATE OF OREGON  
FOR THE COUNTY OF JACKSON

In the Matter of:

Heidi Marie Brown,

Petitioner,

and

Arnaud Paris,

Respondent.

Case No.: 22DR17285

**ORDER FOR WARRANT IN LIEU OF  
WRIT OF HABEAS CORPUS RE:  
CUSTODY OF CHILDREN EVA AND  
JULIETTE PARIS, AND ARREST OF  
RESPONDENT, ARNAUD PARIS**

**[ORS 34.380 – 34.390]**

[EX PARTE]

**THIS MATTER** came before the Court on the *Motion for Warrant in Lieu of Habeas Corpus*, filed by Petitioner, hereinafter Mother.

Upon review of the *Motion*, and good cause appearing, the Court makes the following

**FINDINGS OF FACT:**

1. The children, Eva Paris and Juliette Paris, both age 9, are illegally imprisoned and restrained of the children's liberty in that Mother is the sole legal custodian of the children.

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2. This Court previously assumed UCCJEA jurisdiction pursuant to ORS 107.741(1)(b), and no other court has jurisdiction. It is appropriate that this court maintain jurisdiction.
3. Respondent, hereinafter Father has withheld the child from Mother against Mother's wishes and without legal right.
4. The children were taken out of Oregon illegally and are held in illegal confinement and custody by Father.
5. The children were carried out of the state of Oregon before the children could be relieved by the issuing of a writ of *habeas corpus*.
6. Mother's *Motion* is sufficient to justify the issuance of a warrant directed to any law-enforcement officer of Oregon, authorizing and commanding the law-enforcement agency to take the children into custody, as soon as the children can be located, and to bring the children before this court to be dealt with according to law.
7. Mother's *Motion* is sufficient to justify the issuance of a warrant directed to any law-enforcement officer of Oregon, authorizing and commanding the law-enforcement agency to arrest Arnaud Paris, d.o.b. April 14, 1978, Respondent herein.

**NOW THEREFORE, IT IS HEREBY ORDERED** that a warrant issue under the seal of the Jackson Court of Jackson County, Oregon, directed to the sheriff of Jackson County, Oregon, commanding the law-enforcement officer to take Eva Paris, age 9 and Juliette Paris, age 9, into custody as soon as the children can be located and to bring the children before this court to be dealt with according to law. The extradition of the

Page 2 – ORDER FOR WARRANT IN LIEU OF WRIT OF  
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AND JULIETTE PARIS, AND ARREST OF RESPONDENT,  
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children from France is authorized, and the assistance of the Federal Bureau of Investigation (F.B.I.) is authorized.

**IT IS HEREBY FURTHER ORDERED** that a warrant issue under the seal of the Jackson Court of Jackson County, Oregon, directed to the sheriff of Jackson County, Oregon, commanding the law-enforcement officer to arrest Arnaud Paris, d.o.b. April 14, 1978, and to place him in custody for taking and detaining the minor children in violation of law. The extradition of Father from France is authorized, and the assistance of the Federal Bureau of Investigation (F.B.I.) is authorized.

**UTCR 5.100 CERTIFICATE OF READINESS:** This proposed order is ready for judicial signature because ORS 34.380 – ORS 34.390 permit the court to grant issuance of an order for a warrant in lieu of a writ of *habeas corpus ex parte*, on the terms of the pleading so filed.

**DATED** this 25 day of May, 2024.

**BUCKLEY LAW P.C.**

By:

Taylor L. M. Murdoch, OSB No. 111307  
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of Attorneys for Mother

Page 3 – **ORDER FOR WARRANT IN LIEU OF WRIT OF HABEAS CORPUS RE: CUSTODY OF CHILDREN EVA AND JULIETTE PARIS, AND ARREST OF RESPONDENT, ARNAUD PARIS**

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**SUBMITTED BY:**

Taylor L. M. Murdoch, OSB No. 111307  
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Page 4 -- **ORDER FOR WARRANT IN LIEU OF WRIT OF  
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AND JULIETTE PARIS, AND ARREST OF RESPONDENT,  
ARNAUD PARIS**

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